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11	Attorneys for Defendant			
12	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA			
13	TAMMY A. GILL,) Case No: 2:15-cv-00553-JCM-CWH		
14	, ,)		
15	Plaintiff)) JOINT STIPULATION FOR EXTENSION) OF TIME TO FILE DEFENDANT'S		
16	V.) CROSS-MOTION TO AFFIRM		
17	CAROLYN W. COLVIN, Acting Commissioner of Social Security,) (First Request)		
18))		
19	Defendant.			
20	The parties request to extend the time by thirty-one days from September 11, 2015 to			
21	October 13, 2015 for Defendant Carolyn W. Colvin, Acting Commissioner of Social Security			
22	(the Commissioner), to file her Cross-Motion To Affirm. This is the Commissioner's first			
23	request for an extension. ¹			
24				
25	The Court granted the Commissioner an extension prior to filing her Answer because the agency component responsible for producing the Certified Administrative Record had not yet provided it. This occurred prior to briefing.			
26				
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1	There is good cause because the Commissioner's counsel is experiencing a very heavy		
2	workload and was attending full-day in-office training for two days and then was on approved		
3	leave. Further, counsel had a number of deadlines this week, including another District Court		
4	brief, and two more briefs due next week. The Commissioner needs additional time to respond		
5	to the issues raised in Plaintiff's Motion For Reversal. Plaintiff has no objection.		
6			
7	Respectfully submitted,		
8	Date: September 11, 2015		
9	By: <u>/s/* Marc V. Kalagian</u> MARC V. KALAGIAN		
10	*by email authorization on 9/10/15		
11	Attorneys for Plaintiff		
12	Date: September 11, 2015 DANIEL G. BOGDEN		
13	United States Attorney BLAINE T. WELSH		
14	Chief, Civil Division		
15	By: /s/ April A. Alongi		
16	APRIL A. ALONGI Special Assistant United States Attorney		
17	Attorneys for Defendant		
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19			
20			
21	IT IS SO ORDERED.		
22	TI IS SO SKEELED.		
23			
24	DATE: September 14, 2015 THE HONORABLE C.W. NOFFMAN, JR.		
25	United States Magistrate Judge		
26	-2-		

1		DEFENDANT'S	S CERTIFICATE OF SERVICE
2			
3	I certify that I caused a copy of the Joint Stipulation For Extension Of Time To File Defendant's		
4	Cross-Motion To Affirm to be served, via CM/ECF notification, on:		
5		MARC V. KALAGIAN	
6	Law Offices of Rohlfing & Kalagian, LLP 211 East Ocean Boulevard, Suite 420		
7		Long Beach, California 90802 Marc.kalagian@rksslaw.com	
8	Date:	September 11, 2015	DANIEL G. BOGDEN United States Attorney
9			BLAINE T. WELSH Chief, Civil Division
		D,	
11		Ву	APRIL A. ALONGI
12			Special Assistant United States Attorney
13			Attorneys for Defendant
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